

DAVAL

Transflo Corporation

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**Annicella, Alan**

**From:** Barnes, Jan [jbarnes@transflo.net]  
**Sent:** Friday, March 14, 2003 4:22 PM  
**To:** Annicella, Alan  
**Subject:** RE: Written Closure Plan

Sorry for the delay in getting back to you. I am attaching a copy of the Closure Plan that was prepared and submitted in 1997. As far as hazardous waste inspections, we inspect and document the condition of the railcars incoming and outgoing. The inspections are in-depth pursuant to the Rail Road regulations and DOT. As the railcars must be loaded and released within the 10 day window, the inspections are done at least weekly. In addition, prior to transloading any load a visual inspection is done on the car before the initiation of the loading. Upon completion all the transloading hoses and fittings are removed and the railcar is sealed.

For the used oil we are transporters and therefore, do not test the incoming oil. We require the generator (shipper) to provide us analytical data or a waste profile sheet prior to initial approval of the material for transportation. We do not "store" the waste oil per se, however, we do have spill pans under the railcars that are approved by the DEP (we have a letter).

Please let me know if you need additional information or we need to discuss further. Have a great weekend.  
Regards,

*Jan M. Barnes*

**TRANSFLO**

Assistant Dir. Health, Safety & Environmental  
(904) 279-6323

-----Original Message-----

**From:** Annicella, Alan [mailto:Alan.Annicella@dep.state.fl.us]  
**Sent:** Friday, March 07, 2003 9:51 AM  
**To:** Barnes, Jan  
**Subject:** RE: Written Closure Plan

Hey Jan,

Couple of other questions for you.

Do you perform inspections of hazardous waste containers (the rail cars) pursuant to 40 CFR 265.15 and keep these inspection logs at the facility. Does this inspection also meet the requirements of Subpart I of 40 CFR 265?

For used oil, do you determine whether the used oil at the facility has a halogen count below 1,000 ppm? How is this done and are these records maintained at your site for a minimum of three years. Have any of the analyses showed exceedances of the 1,000 ppm level? How was this waste handled? Is there any secondary containment for containers storing used oil?

Thanks for your help with this matter.  
Alan

-----Original Message-----

**From:** Barnes, Jan [mailto:jbarnes@transflo.net]  
**Sent:** Wednesday, March 05, 2003 10:09 AM  
**To:** Annicella, Alan  
**Subject:** RE: Written Closure Plan

We do not generate haz waste, only transfer material we receive from shippers from truck to

3/17/2003

DOCKET # 03.4

railcar for transport to the disposal destination. Do you want to know who the generators are and the destinations of the HW? The generators choose the disposal destinations and supply us with copies of their manifests. We are shown as transporters of the HW.  
Regards,

**Jan M. Barnes**

**TRANSFLO**

Assistant Dir. Health, Safety & Environmental  
(904) 279-6323

-----Original Message-----

**From:** Annicella, Alan [mailto:Alan.Annicella@dep.state.fl.us]  
**Sent:** Wednesday, March 05, 2003 8:50 AM  
**To:** Barnes, Jan  
**Subject:** RE: Written Closure Plan

In addition to the closure plan, would you please supply me with the name and EPA identification numbers of who is receiving your waste streams (hazardous waste, used oil, etc.) and the volume that they are receiving (or received in 2002).

Thanks,  
Alan

-----Original Message-----

**From:** Barnes, Jan [mailto:jbarnes@transflo.net]  
**Sent:** Friday, February 28, 2003 5:16 PM  
**To:** Annicella, Alan  
**Subject:** RE: Written Closure Plan

I have been researching the closure plan and contacted my predecessor (I only recently took this position) and he assured me a closure plan was prepared a number of years ago. I am trying to locate a copy and will forward to you. Either way I will be in touch.  
Regards,

**Jan M. Barnes**

**TRANSFLO**

Assistant Dir. Health, Safety & Environmental  
(904) 279-6323

-----Original Message-----

**From:** Annicella, Alan [mailto:Alan.Annicella@dep.state.fl.us]  
**Sent:** Wednesday, February 26, 2003 1:22 PM  
**To:** Barnes, Jan  
**Subject:** Written Closure Plan

Jan,

I got your fax. Thanks for the information. Pursuant to Section 62-730.717 (b), transfer facilities are required to have a written closure plan. Do you have this plan? Has it been submitted pursuant to the same section?

Thanks for your help with this matter. You may contact me by responding to this email, or by calling me at (904) 807-3369.

Sincerely,

3/17/2003

Alan Annicella

Alan A. Annicella  
Environmental Specialist  
Florida Department of Environmental Protection  
Northeast District Hazardous Waste Section  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256  
(904) 807-3300, x3369 SunCom 804-3300, x3369  
(904) 448-4366 (facsimile)

**CLOSURE PLAN**

**BIDS TERMINAL**  
**116 RR DRUID STREET**  
**JACKSONVILLE, FLORIDA 32254**

Prepared for  
Bulk Intermodal Distribution Services  
500 Water Street  
Jacksonville, FL 32202

April 1997

Prepared by  
Kimley-Horn & Associates  
1617 Atlantic Blvd., Suite 101  
Jacksonville, FL 32207

Project

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### Table

- 1 Action Levels

### Figures

- 1 Site Plan
- 2 Detail - Hazardous Waste Transfer Area

# 1 INTRODUCTION

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## 1.1 Purpose

This plan has been prepared in accordance with the requirements of 40-CFR, Part-265 and 62-730.171 Florida Administrative Code (FAC) for closure of RCRA transfer facilities and identifies all steps necessary to close the hazardous waste transfer area at the Bulk Intermodal Distribution Service (BIDS) terminal in Jacksonville, Florida. This plan provides for the clean closure of this area; therefore, a post-closure plan is not required. The facility is not subject to the post-closure care requirements of disposal facilities.

As required by 40-CFR, Part-265, Subpart G and 62-730.171 FAC (i.e. closure performance standard), the closure procedures described in this plan will minimize the need for further maintenance, and will control, minimize or eliminate, to the extent necessary to protect human health and the environment, escape of hazardous waste, constituents, leachate, contaminated run-off, or waste decomposition products to the ground or surface waters or to the atmosphere.

A copy of this plan will be stored at the facility at all times and will be available for review during normal working hours by representatives of the Florida Department of Environmental Protection (FDEP) and U. S. Environmental Protection Agency, Region IV, until closure of the transfer area is complete.

The following sections of the closure plan provide information concerning the clean closure of the hazardous waste transfer area as required by 62-730.171(2)(b) FAC and 40-CFR 265.111, 265.112(c), 265.114, and 265.115. Section 1 of this plan provides a physical description of the facility and waste management practices. Section 2 provides a description of a field inspection conducted at the site. Section 3 identifies closure objectives. Section 4 presents the procedures necessary for final closure of the hazardous waste transfer area.

## 1.2 Facility Description

### 1.2.1 General

The facility and equipment are owned by BIDS and are operated by Arrow Terminals. Arrow Terminals is responsible for the daily operations and ensuring that all storage requirements (duration, inspections, minor maintenance, etc...) are adhered to. The BIDS terminal is located approximately one mile south of Interstate-4, in Tampa, Florida.

The terminal provides trans-loading services for bulk materials. Materials are trans-loaded to and from rail cars. The overall facility is approximately 190,000 square feet and consists of a truck scale with two ramps, a trailer used as an

office, and a 1000 square foot shop with an additional storage facility under construction. Six spur rail lines are present at the facility. Rail cars are parked on the six lines for loading and unloading of bulk materials. The hazardous material/waste to be transferred at this terminal is a synthetic fuel. The synthetic fuel will be brought to the terminal by truck. The synthetic fuel will then be trans-loaded to rail cars for further transportation to a facility for use as a fuel or to a recycling facility. Only two rail tank cars will be loaded at any given time. Figure 1 shows the BIDS terminal and the designated synthetic fuel transfer area.

### **1.2.2 Waster Transferred**

The BIDS terminal is a hazardous waste transfer facility. The hazardous waste transferred at the terminal is a synthetic fuel/industrial furnace fuel (D001, D008, D009, D010, D011, D035, F001, F002, F003, F004, and F005). A copy of the Material Safety Data Sheet for the synthetic fuel is provided in Appendix A.

### **1.2.3 Hazardous Waste Transfer Area**

BIDS has designated an area in the northern section of the terminal as the hazardous waste transfer area. This area, as illustrated in Figure 2, is bound by rail line number 4 on the south side and a rail line number 3 on the north side. A 100 foot wide asphalt paved section between the two tracks is wide enough to drive a semi-truck along. The transfer area is approximately 120 feet long. The cars will be loaded on the eastern end of track number 4. This area is long enough to park two rail tank cars. Drip pans are in place on the designated loading area. A 6 foot wide area directly under the drip pans is constructed of railroad ballast only. Asphalt pavement is located on both sides of the track number 4. A trench drain parallels track number 4 approximately one foot north of the track. This trench line is piped to the stormwater outlet structure along the east end of the site.

All truck and rail cars entering and leaving the terminal will be clearly and properly labeled to identify their contents, consistent with applicable regulations for the transportation of hazardous materials and any applicable health and safety requirements.

### **1.2.4 Maximum Inventory**

The approximate maximum quantity of hazardous waste capable of being stored in two rail tank cars in the transfer area is 30,000 gallons. It is not anticipated that the rail cars will be on-site for more than six days. Typically, the rail tank car switch out schedule is Tuesday, Thursday, and once on the weekend, Section 62-730.171, FAX, however, permits on-site storage of hazardous waste for up to ten (10) days.



## 2 FIELD INSPECTION

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### 2.1 Observations

On DATE, 1997, personnel from Arrow Terminals, and Kimley-Horn and Associates, performed an inspection of the BIDS hazardous waste transfer area. The purpose of this inspection was to :

- Identify potential signs of spills or leaks (e.g., stained or damaged concrete or asphalt)
- Evaluate the integrity of the staging area, containment devices, and drains.

The inspection revealed that the transfer area is in fair condition. The area has observable cracks or other damage to the asphalt pavements in the area north of the transfer area. The cracks in the asphalt exposes the limerock base to any spill. The asphalt is approximately 2-inches thick with a 6-inch lime rock base. A trench drain separates the tracks from the transfer area. Stainless steel drip pans are in place between the rails in the transfer area. There is no drain system for the drip pans. At the time of inspection there were no visible cracks in the drip pans. No signs of spills or leaks were identified in the transfer area.

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## **3 CLOSURE OBJECTIVES**

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### **3.1 General**

Closure of the hazardous waste transfer area will be conducted in a manner that will meet the closure performance standard of 40-CFR-265.111. The general closure performance standards require that closure activities:

- Minimize the need for further maintenance.
- Control, minimize or eliminate, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.
- Comply with the closure requirements of this subpart, including, but not limited to, the requirements of 40-CFR-265.197, 265.228, 265.258, 265.280, 265.310, 265.351, 265.381, 265.404, and 264.1102 in as much as they apply to this facility.

Implementation of the closure procedures described in Section 4 of this plan will ensure that the above performance standards are met.

In order to determine whether closure activities are complete, "action levels" for those specific hazardous substances associated with the synthetic fuel handled in the transfer area will be used. The action levels used at the BIDS terminal are the Florida groundwater guidance concentrations unless otherwise noted. Table 1 lists the specific hazardous substances of concern and their corresponding action levels. Those compounds are constituents of the synthetic fuel transferred at the BIDS terminal, and will serve as an indicator for hazardous substances.

## **4 CLOSURE PROCEDURES**

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### **4.1 General**

This section describes the procedures to be followed in the event the hazardous waste transfer area no longer handles hazardous waste, or a contingency of emergency triggering the cleanup procedures of the contingency plan occurs. This closure plan assumes that contingency plan procedures will limit any contamination to the hazardous waste transfer area indicated on Figure 2. In the event that contingency plan procedures are not completely successful, some additional areas may need to be closed and the closure plan will then be expanded to address the other areas.

### **4.2 Partial Closure - Hazardous Waste Transfer Area**

Partial closure of the transfer area prior to final closure is not anticipated.

### **4.3 Final Closure - Hazardous Waste Transfer Area**

The hazardous waste transfer area is located in the north central section of the terminal as shown in Figure 2. If the transfer area is closed, and no release has occurred, then a visual inspection of the area will be conducted. Stains, odors, and other signs of spills will be looked for during the inspection. The area will be declared clean closed if stains or other signs of spills are not apparent.

The following closure activities will be followed if a release has occurred. All hazardous wastes will be removed from the transfer area and transported to an appropriate permitted disposal facility. Pads or containment berms will be emplaced to control movement of liquids on the ground surface and in the drip pans. Free liquids will be pumped into drums or tanks, or adsorbed with pads. Asphalt, drip pans, and rails will be washed with a non-alcohol based detergent and then steam rinsed. Runoff will be controlled by the use of adsorbent pads or containment berms. The ballast will be recovered and washed in an appropriate soil washing system. The detergent wash water and rinse water will be collected and stored in separate, labeled drums for chemical analysis. All liquids, soil and other waste materials will be managed as hazardous waste until such time as analysis proves their non-hazardous nature. Soil samples will be taken in the ballast area between the rail and the asphalt and analyzed for the compounds listed in Table 1. The soils will be excavated if, the analytical, results indicated that the soils are contaminated above the action levels in Table 1. Soils will be excavated, horizontally and vertically, until sampling indicates contaminant levels are below the action levels. If a groundwater impact is suspected, groundwater samples will also be taken and analyzed for the compounds listed in Table 1. If the results are above the action levels presented in Table 1, then treatment of the

groundwater will be necessary. Groundwater will be pumped from open pits or wells into tankers until groundwater sampling indicates that groundwater contamination is below the action limits.

A sample of the final rinse, soil samples, and groundwater samples, if necessary, will be collected, plus a duplicate for each media. Appropriate QA/QC procedures will be followed for sample collection, analysis, and data verification (see Appendix B). Samples will be analyzed for the compounds listed in Table 1. All sampling and analysis will be conducted by a laboratory with an approved CompQAP. Results will be compared to the action levels identified in Table 1. If the analysis indicates contamination (i.e., concentrations are above the action levels), then decontamination procedures will be repeated for the contaminated media, or an alternative procedure will be proposed. BIDS reserves the right to propose alternative action levels should the final analyses from a second cleaning exceed the action levels in Table 1.

In accordance with 40-CFR-265.114, during closure activities all contaminated equipment, structures and soil will be properly disposed of, or decontaminated. Collected wash water and rinsate will be characterized per hazardous waste requirements. Hazardous wastes will be shipped to a permitted Treatment Storage and Disposal Facility (TSDF) in accordance with 40-CFR, Part 262. Nonhazardous wastes will be containerized and sent to an appropriately permitted waste facility.

#### **4.4 Schedule and Notifications**

This closure plan shall be submitted to the FDEP in order to authorize a change to this closure plan. The plan will be amended if:

- Changes in operating plans or facility design affect the closure plan, or
- There is a change in the expected year of closure, if applicable, or
- In concluding final closure activities, unexpected events require a modification of the closure plan.

As required by 40-CFR-265.112(c) (2) and (3), BIDS will amend, and submit to FDEP, the modified closure plan at least 60 days prior to the proposed change in facility design, or operation, or no more than 60 days after an unexpected event has occurred which has affected this closure plan. If an unexpected event occurs during the final closure period, BIDS will amend, and submit to FDEP, the modified closure plan no more than 30 days after the unexpected event.

In accordance with 40-CFR-265.112(c)(4), FDEP may request modifications to the closure plan under the conditions described in 40-CFR-265.11(c)(1). BIDS

must submit the modified plan within 60 days of the request from FDEP, or within 30 days if the unexpected event occurs during final closure.

#### **4.5 Certification of Closure**

In accordance with 40-CFR-265.115, upon completion of final closure activities, a certification of closure will be prepared and certified by the owner or operator and an independent registered professional engineer indicating that the transfer area has been closed as specified in the approved closure plan. This certification will be transmitted to FDEP via registered mail within 60 days of completion of final closure activities.

#### **4.6 Future Transfer Activities**

After closure of the synthetic fuel transfer area is completed and the certification of closure submitted to FDEP is approved, the transfer area may be reopened for transfer of synthetic fuels. The transfer area will be operated in accordance with all applicable requirements for transfer facilities.

## LIMITATIONS

The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, nor the use of segregated portions of this report.

## TABLES

Table 1

### ACTION LEVELS

Hazardous Substance	Groundwater Action Levels (mg/L)	Soil Action Levels (mg/kg)
Acetone	700	8000 <sup>a</sup>
Acetonitrile	200 <sup>a</sup>	500 <sup>a</sup>
Butyl Acetate	43	b
Carbon Tetrachloride	3	5 <sup>a</sup>
Dimethyl Formamide	b	b
Ethyl Acetate	100	b
Ethyl Alcohol	b	b
Heptane	b	b
Hexane	10	b
Isopropyl Alcohol	b	b
Lead	15 <sup>c</sup>	b
Mercury	2	200 <sup>a</sup>
Methanol	b	b
Methyl Acetate	b	b
Methyl Ethyl Ketone	170	400 <sup>a</sup>
Methyl Isobutyl Ketone	350	400 <sup>a</sup>
Methylene Chloride	5 <sup>a</sup>	90 <sup>a</sup>
n-Propyl Acetate	b	b
Pyridine	40 <sup>a</sup>	80 <sup>a</sup>
Selenium	50 <sup>c</sup>	b
Silver	100 <sup>c</sup>	200 <sup>a</sup>
Toluene	1000 <sup>c</sup>	20000 <sup>a</sup>
1,1,1-Trichloroethane	200 <sup>c</sup>	7000 <sup>a</sup>
Xylene (Total)	10000 <sup>c</sup>	200000 <sup>a</sup>
NOTES: Unless otherwise noted the groundwater action levels were set using the FDEP Groundwater Guidance Concentrations.  a- The action levels were set using the proposed rules of 40-CFR-264.521(a)(2)(i-iv), Appendix A. b- The action level shall be set at the background concentration level for this facility. c- State of Florida Water Quality Standards, Chapter 62-550 FAC.		

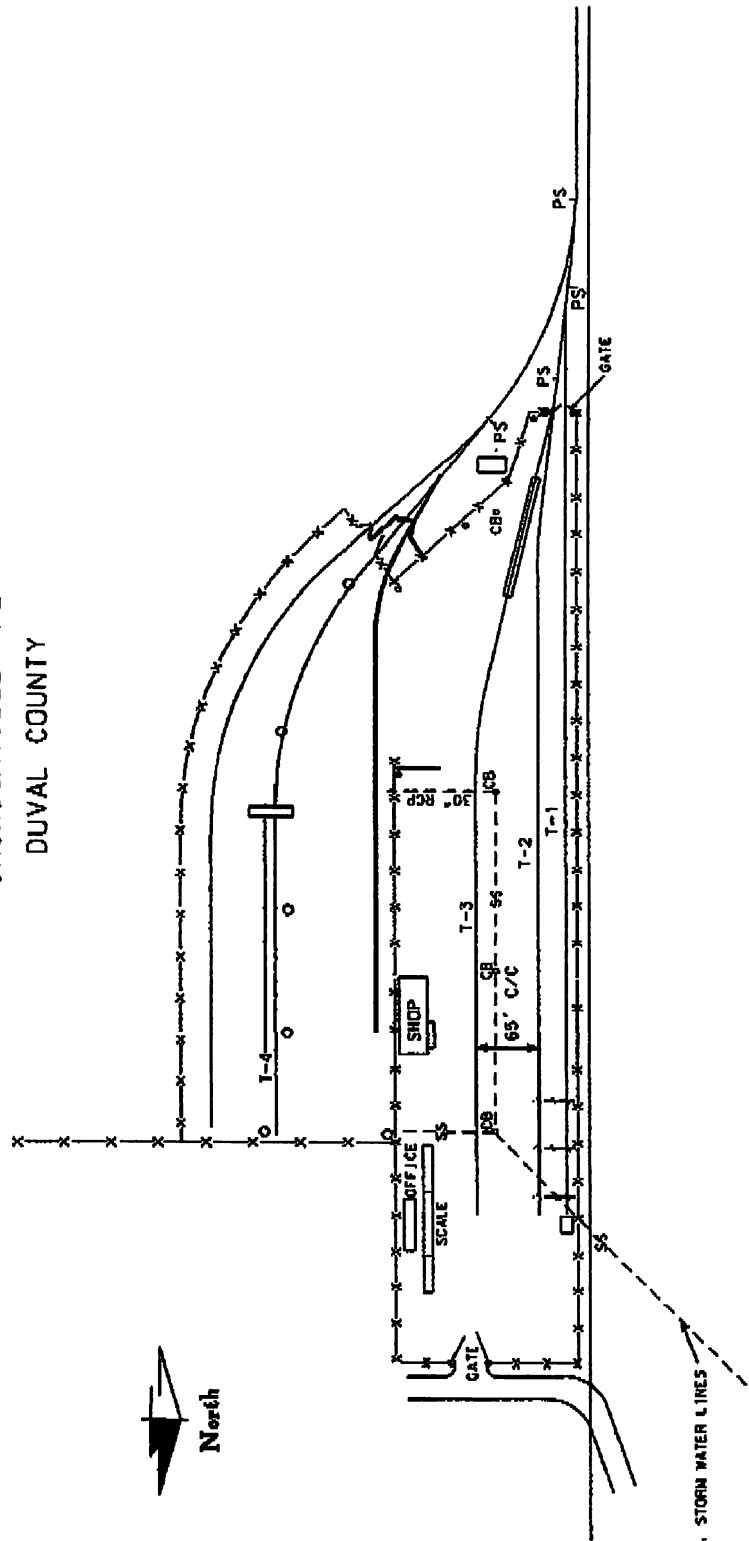
## **FIGURES**

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### **SITE PLAN**



JACKSONVILLE, FL.  
DUVAL COUNTY



EXIST. STORM WATER LINES

<b>CSX</b> TRANSPORTATION RAIL DIVISION 1000 N. GULF AVENUE JACKSONVILLE, FL. 32202	
PROJECT NO. 904 279 6306	SHEET NO. 01
DATE 03/14/2003	DRAWN BY J. J. JAMES
CHECKED BY J. J. JAMES	APPROVED BY J. J. JAMES

...\\dwg\jaxe\expansion98.dgn 03/14/2003 13:08:40

## **APPENDIX A**

### **SYNTHETIC FUEL MSDS**

# MATERIAL SAFETY DATA SHEET

Hazardous Waste Fuel/Industrial Furnace Fuel

Page 1 of 5  
August 28, 1992

Safety-Kleen Corp.

777 Big Timber Road, Elgin, IL 60123

## EMERGENCY ASSISTANCE

For emergency assistance involving chemicals, call Chemtrec  
(800) 424-9300

## FOR PRODUCT AND SALES INFORMATION

Contact Safety-Kleen Corp., 777 Big Timber Road  
Elgin, Illinois 60123 - (708) 697-4502

## PRODUCT IDENTIFICATION

Product Name: Hazardous Waste Fuel/  
Industrial Furnace Fuel

CAS No.: See ingredient list.  
SKE code: F2005

Names/Synonyms: Synthetic Fuel, Chemical Based Fuel,  
Waste Fuel, Alternative Synthetic Fuel

Hazard Rating (NFPA 704):

Hazard Rating Scale:

Date Issued: 8/92

Supersedes: 3/87

Health : 2

0 = Minimal 3 = Serious

Fire : 3

1 = Slight 4 = Severe

Reactivity : 0

2 = Moderate

Special : None

## INGREDIENTS

Component	CAS No.	OSHA PEL	ACGIH TLV	Other Limit	
Water (20-50%)	None	None	None	None	None
Industrial Solvents - Alcohols (20 to 40%):					
Methanol	67-56-1	200	200	None	Flammable,
Ethyl Alcohol	64-17-5	1000	1000	None	Flammable
N-Propyl Alcohol	74-23-8	200	200	None	Flammable
Isopropyl Alcohol	67-63-0	400	400	None	Flammable
N-Butyl Alcohol	74-36-3	50	50	None	Flammable, Irritant
sec-Butyl Alcohol	78-92-2	150	150	None	Flammable
Isobutyl Alcohol	78-83-1	50	50	None	Flammable, Corrosive
Tert-Butyl Alcohol	75-65-0	100	100	None	Flammable
Industrial Solvents - Ketones (5 to 10%):					
Acetone	67-64-1	750	750	None	Flammable, Irritant
Methyl Ethyl Ketone	78-93-3	200	200	None	Flammable, Irritant
Methyl Isobutyl Ketone	103-10-1	50	50	None	Irritant
Cyclohexyl Ketone	108-84-1	25	25	None	Flammable

# MATERIAL SAFETY DATA SHEET

Hazardous Waste Fuel/Industrial Furnace Fuel

Page 2  
August 29, 1992

## Industrial Solvents - Esters, Ethers and Amides (1 to 10%):

Ethyl Acetate	141-78-6	400	400	None	Flammable
n-Propyl Acetate	109-60-4	200	200	None	Flammable, Irritant
Isopropyl Acetate	108-21-4	250	250	None	Flammable
Butyl Acetate	123-86-4	150	150	None	Flammable, Irritant
Dimethylformamide	68-12-2	10	10	None	OSHA/ACGIH List
2-Methoxyethanol	109-86-4	25	5	None	Flammable
N,N-Dimethylacetamide	127-19-5	10	10	None	OSHA/ACGIH List
Tetrahydrofuran	109-99-9	200	200	None	Flammable

## Industrial Aromatic Solvents & Hydrocarbons (5 to 50%):

Toluene	108-88-3	200	100	None	Flammable
Ethyl Benzene	100-41-4	100	100	None	Flammable
Xylene	1330-20-7	100	100	None	Flammable
Mineral Spirits	8052-41-3	500	100	None	Combustible
Hexane	110-54-3	500	500	None	Flammable
Heptane	142-82-5	500	500	None	Flammable

## Industrial Chlorinated Solvents (1 to 10%):

Chloroform	67-66-3	2	10	None	OSHA/ACGIH List
Methylene Chloride	75-09-2	500	100	None	OSHA/ACGIH List
1,1,1-Trichloroethane	71-55-6	350	350	None	OSHA/ACGIH List
Trichloroethylene	79-01-6	50	50	None	OSHA/ACGIH List
Perchloroethylene	127-18-4	25	50	None	OSHA/ACGIH List
Fluorocarbons	75-13-1	1000	1200	None	OSHA/ACGIH List

## PHYSICAL PROPERTIES

Boiling Point, Deg. F: 130	Vapor Pressure, MM HG/20 Deg. C: 10
Melting Point, Deg. F: N/A	Vapor Density (AIR=1): 2.5
Specific Gravity (Water=1): 0.9	Water Solubility, %: 0-10%
Appearance and Odor: Dark, Opaque, Resinous Liquid - Lacquer Odor	Evaporation Rate (Butyl Acetate=1): Approx. 1.0

## FIRST AID MEASURES

If Inhaled: Remove to fresh air. Give artificial respiration if not breathing. Get immediate medical attention.

In Case of Eye Contact: Immediately flush eyes with lots of running water for 15 minutes, lifting the upper and lower eyelids occasionally. Get immediate medical attention.

In Case of Skin Contact: Immediately wash skin with lots of soap and water. Remove contaminated clothing and shoes; wash before reuse. Get medical attention if irritation persists after washing.

If Swallowed: Do not induce vomiting. Get immediate medical attention.

**MATERIAL SAFETY DATA SHEET**  
**Hazardous Waste Fuel/Industrial Furnace Fuel**

Page 3 of 5  
 August 28, 1992

**HEALTH HAZARD INFORMATION**

**Primary Routes of Exposure:** Inhalation, skin or eye contact.

**Inhalation:** Vapors and mists irritate the nose and throat. Inhalation of higher concentrations may cause headaches, nausea, vomiting and coma. Inhalation of very strong concentrations or prolonged exposure may cause unconsciousness or death.

**Eye Contact:** Vapors will irritate the eyes. Liquid and mists will irritate and may burn the eyes.

**Skin Contact:** May be absorbed through skin. Brief contact may dry the skin. Prolonged or repeated contact may irritate the skin, causing dermatitis.

**Swallowed:** Swallowing large quantities causes headaches, nausea, vomiting and perhaps unconsciousness. Swallowing the liquid may result in vomiting. If vomiting occurs spontaneously, do not allow vomitus to be breathed into the lungs, as even a small quantity in the lungs may result in chemical pneumonitis and pulmonary edema/hemorrhage.

**Chronic Effects of Exposure:** Prolonged or repeated exposure to high concentrations may cause loss of appetite, nose bleeds and liver, kidney, and renal dysfunction.

**Medical Conditions Generally Aggravated by Exposure:** None reported.

**TOXICITY DATA**

No specific toxicity data developed for this mixture.

**PERSONAL PROTECTION**

**Ventilation:** Local mechanical exhaust ventilation capable of maintaining emissions at the point of use below the weighted average PEL.

**Respiratory Protection:** If use conditions generate vapors or mists, we approved respirator appropriate for those emission levels. Appropriate may be a full facepiece or a half mask air-purifying cartridge respirator for organic vapors/mists, a self-contained breathing apparatus in the pressure demand, or a supplied air respirator.

**Eye Protection:** Chemical goggles. It is generally recognized that contact should not be worn when working with chemicals because contact increases the severity of an eye injury.

**Protective Clothing:** Long-sleeved shirt, trousers, safety shoes and gloves.

**Other Protective Measures:** An eyewash and safety shower should be nearby and ready for use.

**FIRE AND EXPLOSION INFORMATION**

**Flash Point, Deg. F:** Less than

**Method Used:** FCC

**Extinguishing Media:** Use water spray, dry chemical, alcohol foam or CO<sub>2</sub>.

**DIRECT WATER STREAM.**

**Flammable Limits in Air:**

**Lower:** 1 **Upper:**

**NOT US-**

## MATERIAL SAFETY DATA SHEET

Hazardous Waste Fuel/Industrial Furnace Fuel

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**Special Fire Fighting Procedures:** Firefighters should wear self-contained breathing apparatus and full protective clothing. Use water spray to cool nearby containers and structures exposed to fire.

**Unusual Fire and Explosion Hazards:** Extinguish all nearby sources of ignition.

HAZARDOUS REACTIVITY

**Stability:** Stable

**Polymerization:** Will not occur.

**Conditions to Avoid:** Heat, sparks and open flames.

**Materials to Avoid:** Acids, oxidizing materials.

**Hazardous Decomposition Products:** May liberate carbon monoxide, carbon dioxide, hydrogen chloride, chlorine and phosgene.

SPILL, LEAK AND DISPOSAL PROCEDURES

**Action to Take for Spills or Leaks:** Wear protective equipment including rubber boots, rubber gloves, rubber apron and a self-contained breathing apparatus in the pressure/vacuum mode or a supplied air respirator. If the spill or leak is small, a full facepiece air purifying cartridge respirator equipped for organic vapors may be satisfactory. In any event, always wear eye protection. Extinguish all ignition sources and ensure that all handling equipment is electrically grounded. For small spills or drips, mop or wipe up and dispose of in DOT-approved waste containers. For large spills, contain by diking with soil or other non-combustible absorbent materials and then pump into DOT-approved waste containers or absorb with non-combustible absorbent material and place the residue in DOT-approved waste containers. Keep out of sewers, storm drains, surface waters and soil. Comply with all applicable governmental regulations on spill reporting and handling and disposal.

SPECIAL PRECAUTIONS

**Storage and Handling Precautions:** Keep away from heat, sparks and flames. Store in cool, dry, well-ventilated place away from incompatible materials. Ventilate frequently, and more often in warm weather, to relieve pressure. Electrical equipment when handling this product and use only non-sparking tools. Keep container tightly closed when not in use. Do not use pressure to empty container. Wash thoroughly after handling. Do not get in eyes, on skin or on clothing.

**Repair and Maintenance Precautions:** Do not cut, grind, weld or drill on or near this material.

**Other Precautions:** Vapors of this product are heavier than air and will collect in low places, such as pits or degreasers or other poorly ventilated areas. Do not enter these places where vapors are suspected unless special respiratory protection is worn and an observer is present.

FOR ADDITIONAL INFORMATION

Contact J.W. Hermann, (312) 694-2700, Extension 7341.

NOTICE

All information, recommendations and suggestions appearing herein concerning this product are based upon data obtained from the manufacturer and/or recognized technical sources. However, Safety-Kleen Corp. (SK), makes no warrant representation or guarantee as to the accuracy, sufficiency or completeness of the material set forth herein. It is the user's responsibility to determine the safety, toxicity and suitability of his own use, handling and disposal of the product. Additional product literature may be available upon request. Since actual use by others is beyond our control, no warranty, express or implied, is made by SK as to the effects of such use, the results to be obtained or the safety and toxicity of the product, nor does SK assume any liability arising out of use by others of the product referred to herein. The data in this MSDS relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process.

END OF MSDS

## **APPENDIX B**

### **SAMPLING AND ANALYSIS PLAN**



## **SAMPLING AND ANALYSIS PLAN**

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These sampling and analysis procedures are designed to ensure the integrity of the sampling and testing for the clean closure of the hazardous waste transfer area at the BIDS facility.

As described in Section 4 of the closure plan, closure will include decontamination of the asphalt, rail, and rail road ballast, if necessary, with a non-alcohol based detergent wash followed by a rinse using hot water or steam. The wash and rinse water will be collected and stored separately.

All sampling will be conducted with an approved CompQAP. During final rinse, grab samples will be collected. Samples will be analyzed for the target parameters, defined by the constituents of any hazardous wastes handled by the transfer facility obtained from sources including MSDSs and hazardous waste materials listed in Table 1. Duplicate samples will also be collected for quality assurance testing. Before sample collection, sample containers will be labeled. Labeling information will include sample number, description of contents, date, sampler's name, and analytical testing requirements. Samples of the rinse water will be collected by submerging a bailer or other appropriate sampling device into the collected rinse water and immediately filling the pre-labeled sampling containers. Samples of the surface water and/or groundwater will be collected by submerging a bailer or other appropriate sampling device into a well or open pit and immediately filling the pre-labeled sampling containers. Soil samples will be collected in a glass jar. Field personnel will note the sample location and description (e.g., rinse water from asphalt), and the associated sample number in the field notebook. All samples will be transported with chain-of-custody documentation to the laboratory in sealed, iced coolers.

Samples will be analyzed at a state certified laboratory with an approved CompQAP, using the following EPA methods:

- Regulated solvent scans - 8015
- Volatile organics - 8260
- Semivolatile organics -8270

All laboratory data will be validated using standard EPA assurance protocols. The validated data will then be compared to action levels listed in Table 1 of the closure plan to determine whether additional decontamination steps need to be taken.